

1887-061 Chancery Causes: William D. Zion vs. Barbary J. Zion
Lee Co. Barbary J. Zion vs. William D. Zion

1 Plat

CA-Estate Dispute
T-Property

-Reed

To the Honorable John A. Kelly,
Judge of the Circuit Court of Lu County

Humbly complaining, your
orator Wm. D. Giam a citizen of said
county would beg leave to repre-
sent unto your Honor; That John
P. Giam departed this life on the
day of 1885 seized &
possessed of three valuable tracts
of land situated, lying and being
in Lu County on the Brush ridge
and about eight miles East of the
town of Jourdell, copies of the
deeds to said land are here filed
and marked "A, B, & C" respectively
and prayed to be considered as a
part of this, your orator's, bill of
complaint; that your orator is the
son and only heir at law of the
said John P. Giam; that the deces-
ed John P. Giam left surviving him
his widow, Barbary J. Giam;

With the above premises your
orator is advised that he is in-
titled to said tracts of land, sub-
ject to the dower interest of the
said Barbary J. Giam in said
tracts of land, and he is cognizant

that it was his duty as him to
said John P. to ^{have} assign to said
widow her dower interest in
said tracts of land, which duty
he often and repeatedly th proposed
to do, but the said widow as
often refused to assent to the
assignment of her dower; and
your orator is further advised that
your Honor's court is the guardian
and protectorate of the rights of
hirs as well as those of widows;
he therefore comes to your court,
and begs your Honor to take cog-
nizance of his cause, appoint
proper commissioners to assign
said widow her full dower in
said lands, make the said widow,
Barbary J. Jiam, a party defend-
ant to this bill of complaint,
^{the said Barbary J. Jiam}
that she ^{be} required to answer
upon her corporal oath, as ful-
ly and effectually each and every
averment contained in this bill
of complaint, as if she had been
specially interrogated thereto,
and that such other and
general relief may be granted

and given to your orator as the
nature of his cause may demand
and that may be adapted to equi-
ty and good conscience. May
Subpoena issue. And your
orator will ever pray &c

Duncan & Pennington
and Richmond & Orr

Attys for Comfells.

Wm D. Giam

W. { Bierin Chan

Barbary J. Giam

1880 July Bill file d

" Sep End + D. Axi

" Aug. L. Ch. Conf d

+ Cause set for hearing

" Nov. Continued

1887 Mr. Bierce + Counts

" Aug. Decree + Counts

" Nov. Decree final

1880 to 1890

21

6	\$9.05
2	2.50
1	1.40
4	5.00
1	7.00
Sum	5.00
estimate	5.00

28/39.75
 \$19.97 1/2

5.00
 2.11
 \$2.89

ALL
2222222222

To the Honorable John A. Kelly, Judge
of the Circuit Court of Lee County:

Humbly complaining, your orator
William D. Gion, a citizen of said county,
would respectfully represent unto your
Honor, that John P. Gion on the
day of 1885 departed this life seized
and possessed of three large and val-
uable tracts or parcels of land lying
and being in said county about eight
miles East of the town of Jonesville and
on the Lane Creek ridge, copies of the
deeds of said tracts or parcels of land
are here filed and marked "A," "B," &
"C" respectively, and prayed to be consider-
ed as a part of your orator's bill of
Complaint; that the said John P. Gion
deceased, left surviving him his wife
Barbary J. Gion, and your orator; and
that your orator is the son and only heir
at law of the said John P. Gion dec'd.

With these premises your orator
is advised that by the laws of Virginia,
the fee simple lands of which the
said John P. Gion died seized and
possessed passed to, and descended upon
your orator as heir to the said
John P. Gion subject to the rights of

the said widow's dower in said tracts
or parcels of land; and your orator is
also advised that it his duty to assign
said widow her dower in said
lands; And your orator is further
advised that your Honor's Court,
being the guardian and protectorate
of the rights of him, as well as those
of widows, will take cognizance of
his cause and grant him such
relief as equity and good conscience
will deem proper and expedient
from the nature of his cause; there-
upon he comes meekly to your
Honor's Court and reverently prays
your Honor to take cognizance of
his cause, to appoint commissioners
to assign said widow dower in said
lands, to make the said Barbara J.
Gion a party defendant to this bill
of complaint, to require her upon
her corporal oath to answer each
and every averment and allegation
contained therein as fully and pre-
cisely as if she had been specific-
ly and specially interrogated thereto,
and to grant him such other and

general relief as may be in keeping
with equity and good conscience
and that may be adapted to the right,
peculiarity and nature of his cause.

May Subpoena issue &c.

Duncan H. Pennington
Pro Quarenti

W. D. Ginn

25. { Bill in Chan

Barbary J. Ginn

90 to 00

3-

To The Hon. John A. Kelley Judge
of the Circuit Court of Lee County
The Cross bills of Barbara J.
Lyon, to bill filed in this Hon.
Court against her by com D. Lyon

Your oratrix would state that
she is entitled, not only to dower
but, entitled in fee to most of
said land; Your oratrix would
state that while her said deceased
husband holds the legal title, he
paid for the same mostly out
of the separate estate of your
oratrix ~~Before~~ ^{At} the time of the pur-
chase of these lands by her husband
and before, and after it was
agreed by him if your oratrix
would aid in the payments
then, he would have secured her
rights in the land, but he failed to
do so. Under this agreement
Contract and understanding made
at the times aforesaid, she did
pay or her said husband did for
her, out of the sales of her own
separate estate, the sales of land
derived by descent from her father
all of which, came to her hands

Since the year 1876—
of her father's estate which de-
scended to her she paid Cash \$300.
A horse at the price of 90.
From her sister's estate - 30-
or possibly more but of her
grand father's estate \$10

But there were probably other
payments made by her said
husband out of her estate not
now remembered. Your oratrix
alleges that these payments were
made for her benefit and in-
tended so at the time and that
she is advised she is entitled
there to in fee, and to recover in
the residue - Her prayer therefore
is that and D. be made a
party defendant to this bill
and answer its allegations on
oath or on a hearing a decree
be rendered, setting apart to her
in fee so much land as
were paid for out of her
separate estate, and down assigned
in the residue and for all
other funds or general relief -

May 1894

J. L. Richmond

R. 2

40
15
25
20
10
18
10
18
100
2.47

Berkey & Lyon
at S. L. & Co.
Care of Lyon

To the Honorable H. S. K. Morrison, Judge of
the Circuit Court of Lee County, Va.

The answer of Wm. D. Zim defendant to
a cross-bill of Complaint exhibited against
him by Barbara J. Zim Complt. in the Chan-
cery cause of Wm. D. Zim vs. Barbara J. Zim
and now pending in this court.

Your respondent reserving to him-
self all just exceptions to the said cross-
bill for answer thereto, as to so much
thereof, as he is advised that is material
he should answer, answers and says. That
he fully and wholly denies that any of the
separate money or property of the said
Complt. formed or constituted any part
of the consideration in the purchase of the
said land. But your respondent just
here admits that some of the money of the
said Complt. was appropriated to the
payment of some of the debts owed by
the said John P. Zim in his life-time
the consideration of which debts hap-
pened to be for the same land to which the
said John P. Zim died seized and possessed.
Your respondent further denies that
there was any agreement or arrangement
or understanding as set out in Complt.
cross-bill, between the said John P. Zim

+Compt't.

either before or after the purchase of
said land that he would have secured to
her, if she would help him to pay for
the said land, any rights or interests in the
same, other than such rights as the law
of this country of itself vests in her. And
your respondent also says that the horse
spoken of in Compt't's. Cross-bill was
~~not~~ gotten by the said John D. Ziam &
after the 4th of April 1877 but was
gotten as well as your respondent ^{and is advised} remem-
bers, as far back as the year 1875. And
more, as per the receipt of James H. Jaynes
personal representation of St. Mury it
will be seen that the said John D. Ziam
had to refund to the said Admr. the sum
of \$43. 46[¢]. said receipt is here filed
and marked "X". But as before stated
by your respondent if anything was
ever paid by the said Compt't., it was
paid in to debts of the said John D. Ziam
that ^{he} owed at the time the said Compt't.
sold her said land, and which debts
owed by the said John D. Ziam happened
to be for the identical land mentioned
in your respondent's original bill,
And Compt't's money for her land being
paid in the usual and common
manner in which good husbands
& wives deal with reference to one

another's property, each considering
the estate of the one the property of
the other and so she permitted and
consented that her separate estate
might be used in the payment of her
husband's debt without even once
thinking of holding him responsible
for the same and without any agree-
ment or understanding that she was
to have any interest in said lands
other than the customary dower
interest.

Your respondent is actually
surprised at the matter and purport
of said Compt's. cross-bill for the
same seems to him to be so unreason-
able, when the same is viewed in the
light of the circumstances of this case.
The deeds to said lands were taken and
acknowledged long before the death
of the said John P. Zier and that with
the full and actual knowledge and
consent of the said Compt's. as to the
purport and tenor of said deeds from
their date of execution at least, or at
least as your respondent is advised
she had constructive knowledge of the
purport and tenor of said deeds from
the time of their registry in the Clerk's
of said county which appears by ref

under to copies of said deeds here filed
in this cause and marked "A. B. C."
respectively, to have been done long
before the death of the said John
P. Zion. Yet with such knowledge
of the manner in which the said
deeds had been made, to your corres-
pondent's knowledge did she ever
make any complaint to the said John
P. Zion or to any one else that her
rights were trammelled or infringed
upon in any article after the
death of the said John P. When your
respondent began to want to share in
the possession, accretions and profits
of the said land owned by him in his
life time; and now having fully
answered the said Campbell's cross-bill of
complaint your respondent prays
to be hence dismissed with his rea-
sonable costs in this behalf expended,
and he will ever pray &c.

H. D. Zion by
Sweeney & Cunningham

Virginia

Lin County, to wit:

This day personally ap-
peared before me

for the county and state aforesaid
W. D. Zion whose answer is above writ-
ten and made oath that the statements
contained in said answer, so far as
made of his knowledge are true, and
so far as made from the knowledge
and information derived from others
he believes to be true

Given under my hand this the
29 day of March 1887

L. A. Hyatt

H. O. Zinn

ads { answers to
2 Cross-bills

Barbary J. Zinn

Filed in open
Court by leave
the 2nd March 1887
J. H. Hyatt

W. S. Zion Campelt.

vs

Barbary J. Zion Deft.

} In Chan.

This cause came on again this day to be heard upon the papers formerly read in the cause and the report of John M. Tate which is annexed to, and was argued by counsel: On consideration of all which and for reasons appearing to the court it is ordered, adjudged and decreed that said report be confirmed, and that W. S. Zion take and hold in fee simple the following described tract of land bounded as follows, to wit: Beginning at point B. of ~~of~~ the plat in said report and on John J. Garry's line S. 80 W about 3 poles to a planted rock, N. 24 $\frac{3}{4}$ W 186 poles to a creek in a line, corner of John F. Skaggs' land, N 74 E 70 p. to the point A on said plat, S 12 E 130 p to the beginning; and that Barbary J. Zion take and hold for her life the following described land set out in said report, to wit: Beginning at the point A in said plat N. 74 E. 20 p to a corner

and wahoo. N. 42. 37 ft. to a spring
 at the head on said flat; N. 28. W. 12 ft
 to a buck stump, N. 57 1/4 E. 8 1/2 ft. to
 the wagon road, S. 23 1/2 E. 14 ft, S. 48 1/2 E
 4 ft, S. 69 E. 16 ft. S. 53 1/2 E. 2 ft. S. 21 E. 14 ft.
 to a rock in or near said road, ~~S. 57 E.~~ S
 61 E. 7 3/4 ft. S. 83 E. 17 ft, S. 13 E. 17 ft. to the ~~main~~
~~road~~ rock of three fumes, S. 74 W. 30 3/4 ft
 to the main road, S. 26 1/2 W. 42 ft along
 said road east of a pond S. 12 E. 15 1/2 ft
 to a small chestnut-corner to John J.
 Gravy's land, thence with Gravy's line
 S. 80 W. 23 1/2 ft to the point-A on said
 flat, N. 12 W. 180 poles to the Beginning.

And it is further ordered and
 decreed that the costs of this suit
 be paid in pursuance, by the par-
 ties, to a decree entered in the cause
 on the 31st day of August, 1887, and
 for the collection of which an exe-
 cution may issue, and this cause
 is ordered to be stricken from the docket.

W. S. Ginn
 vs.
 Deane. Line

Barbary J. Ginn

Entered 7/20/88

Atty. Gen. J. W. Ginn

Examined 1/20/88

Entered this
 11/2/87
 1887.

H. J. Gion
or
Barney J. Gion

} Du. Chy

For reasons
appearing to the court it is
adjudged ordered & decreed that
this cause be continued,

W D Zion
as 3 Dec
Borbury Zion
March 1557
Entered page 31

Enter
March 31st 1884
H. A. K. M.

M. D. Zion

Barbary J. Zion } In chancery.

This cause came on this day to be heard upon the bill of complaint, and exhibits filed therewith, the cross-bill of Defendant, and answers of M. D. Zion thereto And was argued by counsel. By consent of parties it is ordered, adjudged and decreed that

he and is appointed
of commissioners for the purpose and that they at their earliest convenience go upon the land in the bill and proceedings mentioned and lay off, allot and assign to Barbary J. Zion for her life one half ⁱⁿ of the rental value of the lands aforesaid including the dwelling and out houses ~~and~~ the said John P. Zion lived at the time of his death, which dwelling and out houses shall be taken into consideration by said Commissioners in their determination of the rental value of said lands; and they will assign and allot the other half of said land to M. D. Zion in each case having due regard and reference to ways, water and conveniences; and report their action to a future term of this court.

And by consent of parties it is further, ordered, adjudged and decreed

W.D. Zim

vs { Decree

Barbary J. Zim

Entered page 38

C.D. Book No. 3

for 444 y a l l e .

Entered this

for 444 y a l l e .

Dec 31 - 1884

that the said Barbary J. Zim shall
~~pay all costs of this cause according~~
~~to the difference of the said one half~~
~~of the residue of the cost, by reason~~
~~of the bringing of this suit by the said~~
and the said W.D. Zim will pay the other
half, and for said costs, ~~attached~~
will properly sum up, ~~and present~~
thereupon therefor against either the
said parties, and this cause is con-
cluded.

Virginia.

At a circuit court continued and
held for Lee Co. at &c on 31st day of Aug 1887.

W. D. Zion

Plaintiff



vs.

En Chaney

B. J. Zion

Defendant

x x By consent of parties, it is adjudged
ordered, and decreed that J. W. Co. W. J. Plummer, E. R. Ritten
and Samuel Carter, be and are appointed Comrs.
for the purpose, and that they at their earliest
convenience go upon the lands in the bill and
proceedings mentioned, and lay off, allot and
assign to Barbara J. Zion for her life $\frac{1}{2}$ in
rental value of the lands afore said including
the dwelling and out houses, where the said
Jas. D. Zion lived at the time of his death, which
dwelling and out houses, shall be taken
into consideration by said Commissioners in
their determination of the rental value of
said lands, and they will assign and allot the
other half of said lands to W. D. Zion, in each case
having due regard to water ways and conveniences
and report their action to a future term of this court
and by consent of parties, it is further adjudged or-
dered and decreed that the said Barbara J. Zion
shall pay $\frac{1}{2}$ and that W. D. Zion the other half
of the costs of this suit, and execution may be
thereon against either of the parties, and the cause
is continued (over)

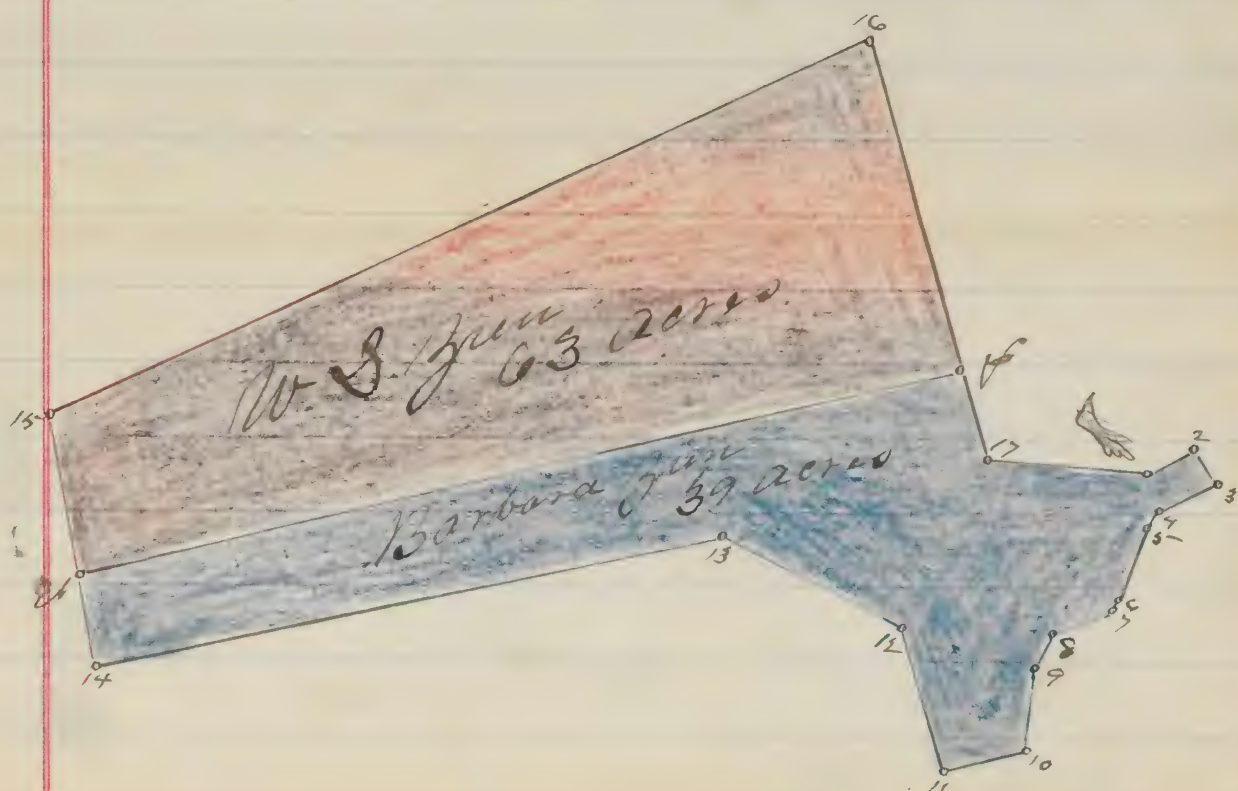
W. O. Grim et al
vs. 
Barbara Grim et al  In chancery.

Pursuant to an order issued from the circuit court of Lee County Va at its August term 1887. Relative to the above styled suit I went upon the lands in the order mentioned and by agreement of both the Plaintiff and Defendant I proceeded alone to Partition the lands without the aid of the other Commissioners and both parties were well satisfied I found the following plat of land as shown by the accompanying plat containing one hundred & two acres Beginning at a Spring and shown on the plat at hand. Thence from there to 2. and on to 17 and to Beginning first line N. 28. W. 12 poles to 2. to a bush stump thence N. 51 1/4. E. 8 1/2 poles to the wagon road. Thence with said road. S. 23 1/2. E. 14 poles. S. 48 1/2. E. 4 poles S. 69. E. 16 poles S. 53 1/2. E. 2 poles. S. 21. E. 14 poles to a rock in or near the road S. 61. E. 7 3/4 poles to a stake. S. 83. E. 17 poles to a stake at the turn of the fence S. 13. E. 17 poles to a stake near the end of three fences S. 74. W. 30 3/4 poles to the main road. S. 26 1/2. W. 42 poles along said road. to a stake east of a fence. S. 12. E. 132 1/2 poles to a small chestnut corner of Geo. Geary's land

Thence with a line of yeary's S. 80. W. 53 1/2 poles
to a planted rock, thence N. 24 3/4 W. 186 poles
to a cedar in a lane corner of Geo. F. Deays'
Thence with his line N. 74. E 90 poles to a poplar
and waukes at the end of three fences thence
N. 4. E 37 poles to the Beginning, when I made
the Survey as shown above, the parties then
agreed to make their own division. The Plain-
tiff W. S. Zim gets the part of the flat
tinged red containing about Sixty three
acres The Defendant gets the part of the
flat-tinged blue containing about thirty
nine acres. The Division line is shown
on the flat from A. to B. and
each of their shores is marked to them
The Plaintiff W. S. Zim 63 acres and
Defendant Barbara Zim 39 acres.
The Division line is on S. 74. W. 18 poles from
the poplar and waukes on the Deays line
on the north of the Survey, and then running
through the farm, so as to strike the South
line 18 poles S. 80. W. of the small chestnut,
yeary's corner, all of which I submit
with the following bill of costs.

Geo M. Tate Fee. \$7.00 Paid

Geo. M. Tate, Commissioner



Virginia Lee County Court clerk's office Jan 5th 1888

The foregoing plat & report of the partition of
the land of John P. Zinn deeds was this day
filed in this office and admitted to record.

Test John R. Gibson Clerk

W. S. Grinn
vs. $\frac{3}{3}$ In chan.
Barbara Grinn
Commissioner
Report

Filed Dec. 5/88
J. G. Hyatt & Co.

Recorded in Deed
Book No. 23 @ 171-213
J. R. Glendon

Examin'd Nov 30
1888

Cours. Feb 7. 89

18	+	30
<hr/> 12		<hr/> 36
		86
		<hr/> 122

This deed made and entered into on the first day of January 1887, by and between Abraham D. Zion and Anna his wife of the first part, and John P. Zion of the second part, all of the county of Lee and State of Virginia Witnesseth that in consideration of the sum of four hundred and twenty four dollars in hand to them paid the receipt of which is hereby acknowledged by the said parties of the first part, hath this day bargained and sold to the said party of the second part, a certain tract or parcel of land lying and being in the county of Lee and State of Virginia on the South side of Cam Creek, ridge containing 82 1/2 acres be the same more or less, and bounded as follows to wit: Beginning at a cedar in a lane corner to Lafayette McGinnis lands on a line between A. D. Zion and John Myers deceased and with said line South 26 E. 60 or 1881) S 25 E 186 poles to a stake in a swamp 180 E 51 poles to a small chestnut, on the dividing line between John Parsons and A. D. Zion and with said line N 15 W. (Row 134, W 187 poles to a stake on top of a ridge, thence with said line N 6 E 5 poles to a water. and posted corner to Lafayette McGinnis lands and with a line thereof S 73 1/4 W 90 poles to the beginning, and the said Abraham D. Zion and Anna his wife will forever warrant and defend against the claim or claims of any and all persons whomsoever the lands hereby conveyed. Witness the following signatures

and seals this day and date above written.

Abraham D. Zion
Anna Zion

D. D.

Virginia, Lee County to wit:

I, John R. Gibson Clerk of Lee County Court in
the State aforesaid do certify that Abraham D. Zion
and Anna Zion his wife whose names are signed
to the foregoing deed dated January 1st 1881. each per-
sonally appeared before me in the said county, and
acknowledged the said writing to be their joint
act and deed, and Anna Zion wife of the said
Abraham D. Zion being examined by me privately
and apart from her said husband, and having
the said aforesaid fully explained to her declared
that she had willingly signed and executed
the same and does not wish to retract it.
The said deed is thereupon admitted to record
given under my hand this the 1st day of January.
1881

John R. Gibson Clerk
of Lee County Court.

C. Sawyer

John R. Gibson Clerk

John P. Zion

True Copy of Dec 20

Asd. Zion & wife

Dec 20 Book 1220

Page 99.

A

See for this copy 50

This deed made this the 26th of December 1853. between
David Smyth & wife of the one part & J. P. Geon of
the second part, both of the Co. of Lee & State of
Virginia. Witnesseth that for & in the consideration
of the sum of \$125.00 one hundred & twenty five dol-
lars, paid in hand paid by J. P. Geon the
receipt whereof is hereby acknowledged & by
these presents doth grant bargain sell & convey
unto the aforesaid J. P. Geon, with covenants of
general warranty a certain tract or parcel of land
lying and being in the Co. of Lee & State of Vir-
ginia on the cane creek ridge. Bounded as follows.
beginning at a stake near the head of a spring
dividing said spring N 28 W 12 poles to a beech.
S 10 1/4 E 10 1/4 poles to a stake in the wagon road.
S 23 1/2 E 14 poles to a stake S 48 1/2 E 4 poles S 67 E 16
poles S 63 1/2 E 2 poles S 22 1/2 E 14 poles S 2 1/2 E 6 poles S 7 E 9
poles S 23 W 11 P. S 26 3/4 E 8 1/2 poles S 26 1/2 W 42 P. to
a stake on a J. P. Geon's line and with said
Geon's line N 72 1/2 W 5 1/4 P. to a stake on top of said
ridge N 4 E 3 1/4 P. to a stake at the head of the
spring at the beginning. Containing by survey
13 3/4 acres to have and to hold the above tract
with all of its appurtenances for ever witness
whereof the above said David Smyth & wife doth
bind themselves to warrant generally the title
to the above tract or parcel of land to the
aforesaid J. P. Geon witness whereof we have

hereto signed our signatures & seals the day
& date above written.

David Smyth Seal
Mary A. Smyth Seal

Virginia Lee County to wit:

I, J. B. Bryatt, a commissioner in chancery
for the county court of Lee County do hereby
certify that David Smyth and Mary A. Smyth,
his wife whose names are signed to the fore-
going deed bearing date on the 26th Decr. 1880,
personally appeared before me in my court
aforesaid and acknowledged the same to be
their act and deed for the purposes therein
stated. And the said Mary A. Smyth being
examined by me privately apart from her
husband and having the aforesaid writing
fully explained to her she the said Mary A.
Smyth declared that she had willingly
executed the same and does not wish
to retract it, given under my hand this
26. Decr. 1880.

J. B. Bryatt Comm'r
Virginia Lee County Court Clerk's office the 19th
day of February 1884. The foregoing deed
bearing date the 26th day of Decr. 1880,
between David Smyth & Mary A. his wife
of the first part and J. P. Zein of the second
part, all of Lee County Va was this day

filed in this office and admitted to
record upon the certificate of J. B. Bryatt,
a Commissioner in Chancery for the County
Court of Lee County Virginia,

Teste John R. Gibson Clerk.

Attest
Teste John R. Gibson Clerk

P. 2
From Copy Deed
Daniel Long the Vnfe.
See, Book 20.
Page - 424.

"B"

Fee for this copy 50¢

This deed made this the 28th day of February 1884 by and between A. M. Parsons of the county of Lee and State of Virginia of the first part and John C. Ginn of the said county of Lee and State of Virginia of the second part Witnesseth that the parties of the first part, have this day for and in consideration of the sum of \$400 Forty Dollars paid by Jas W. Parsons in hand paid the receipt whereof is hereby acknowledged, and by these presents doth grant bargain sell and convey unto the party of the second part, one certain tract or parcel of land lying and being in the county of Lee and State of Virginia on the cane Creek ridge containing 4 full acres and thirty eight poles (more or less) be the same more or less and bounded as follows to wit: beginning at a stake, in the road, leading from cane creek to Shavers ford, thence along a line of John S. Parsons land North 74° to 30 1/4 poles to a stake corner to the George Brider lot and with said line N 13° W 17 poles to a stake in the South edge of a road and with said road N 61° W 72 poles to a stake in same road and with same road as it meanders S 74° W 6 poles to a stake in first said road South 54° to 6 poles to a stake S 10° W 4 poles to a stake S 21° W 82 poles to a stake S 24° to 8 poles to the beginning to have and to hold the said tract or parcel of land with all the appurtenances thereto belonging forever and the parties of the first will warrant generally the title to the above described tract or parcel of land, witness the following signatures and seals this the day

and year first above written.

Amanda M. Parsons *(Seal)*

State of Virginia Lee County to wit:-

I, John A. S. Hyatt a Commissioner in Chancery for the County Court of Lee County do hereby certify that Amanda M. Parsons whose name is signed to the foregoing deed bearing date Feb'y 28th 1884, personally appeared before me in my county aforesaid and signed and acknowledged the said deed to be her act and deed for the purposes therein stated, Given under my hand this 5th June 1884.

John A. S. Hyatt Com'r &c.

Virginia Lee County Court Clerk's office the 28th day of July 1884.

The foregoing deed bearing date February 28th 1884, between Amanda M. Parsons of the first part, and John P. Zion of the second part, both of Lee County Va was this day filed in this office and admitted to record upon the certificate of J. A. S. Hyatt Commissioner in Chancery for the County Court of Lee County Va.

Teste John R. Gibson Clerk.

John P. Zim
From ^{copy} 3 Deed

A. M. Parsons

Deed Book No 20

Page 550

"C"

Fee for this copy 40¢

THE COMMONWEALTH OF VIRGINIA,

TO THE SHERIFF OF LEE COUNTY—GREETING:

WE COMMAND YOU to summon

Barbary J. Zion

to appear at the Clerk's office of the Circuit Court of Lee County, at the Court House, on the first
Monday July next, being Rule Day, to answer a Bill in Chancery exhibited in our
Court against her, by Willie D. Zion

And have then and there this Writ. Witness, J. A. G. HYATT, Clerk of our said Court, at the
Court House, this 25th day of June, 1834, in the 110 year of the Commonwealth.

J. A. G. Hyatt Clerk.

A COPY--TESTE:

(R.Y.O.V.D.V.P.)

Willie D. Zion

us $\frac{3}{3}$ Spain Choy

Barbary J. Zion

To July Rules 1886

Executed by
delivering in
office - Copy to

Barbary J. Zion

June 25-1886

R.D. Shuman
836